

**MONTGOMERY COUNTY, MARYLAND
OFFICE OF INSPECTOR GENERAL**

**COMPLIANCE WITH COMMERCIAL
DRIVER'S LICENSE REGULATIONS
INSPECTION REPORT**

MARCH 2005

TABLE OF CONTENTS

	<u>Page</u>
TRANSMITTAL LETTER	
INTRODUCTION	1
Purpose	1
Background.....	1
Scope, Objectives, and Methodology	2
Scope and Objectives	2
Methodology.....	2
Management Controls	3
Federal and State Regulations.....	3
County Organizational Policies, Procedures, and Practices.....	4
SUMMARY	5
Results in Brief.....	6
Summary of Findings	6
FINDINGS AND RECOMMENDATIONS	7
Finding 1: Inadequate Management Controls.....	7
Finding 2: Lack of Comprehensive Written Policies and Procedures	8
Finding 3: Inadequate Compliance with CDL Regulations.....	10
Prior Audit Recommendations	12
CONCLUSION	14
LIST OF APPENDICES	
County Positions Requiring Commercial Driver's Licenses.....	A-1



TABLE OF CONTENTS (Continued)

LIST OF ABBREVIATIONS

AP	Administrative Procedure
CAO	Chief Administrative Officer
CDL	Commercial Driver's License
CFR	Code of Federal Regulations
DP	Departmental Procedure
DQF	Driver's Qualification File
DPWT	Department of Public Works and Transportation
FTA	Federal Transit Administration
FY	Fiscal Year
MVA	Maryland Motor Vehicle Administration
OHR	Office of Human Resources
OIG	Office of Inspector General
PCIE	President's Council on Integrity and Efficiency

TO THE HONORABLE COUNTY COUNCIL AND COUNTY EXECUTIVE FOR
MONTGOMERY COUNTY, MARYLAND

We have conducted an inspection of Commercial Driver's Licensing practices in several departments of Montgomery County Government. This inspection was conducted in accordance with Quality Standards for Inspections issued by the President's Council on Integrity and Efficiency (March 1993). These standards required that we plan and perform the inspection to provide a reasonable basis for our findings and conclusions. Accordingly, we performed such procedures considered necessary in the circumstances.

The objectives of our inspection were to determine whether County Government has established adequate management controls to ensure:

- overall organizational compliance with commercial driver's license regulations, including assigned accountability;
- effective monitoring of employee compliance with CDL regulations;
- verification that all County employees required to possess a commercial driver's license have a current, valid CDL; and
- implementation of pertinent prior audit recommendations.

This report is the result of our inspection of issues noted above and is intended for the use of the County Council, County Executive, and management of the departments of Public Works and Transportation, Liquor Control, and Fire and Rescue Service. This restriction is not intended to limit distribution of the report, which upon delivery to the County Council and County Executive is a matter of public record.

Office of Inspector General

March 30, 2005

**MONTGOMERY COUNTY, MARYLAND
OFFICE OF INSPECTOR GENERAL**

**COMPLIANCE WITH COMMERCIAL
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March 2005

INTRODUCTION

Purpose

This inspection reviewed compliance with federal and state regulations pertaining to commercial driver's licenses required of certain County employees. In 1986, the Congress of the United States enacted the Commercial Motor Vehicle Safety Act designed to improve the safe operation of commercial vehicles. The State of Maryland enacted its own Commercial Driver's License (CDL) program effective January 1, 1990. The federal and state regulations impose a number of requirements on both the individual issued a commercial driver's license and the employer of commercial vehicle operators. The goals of the regulations are to improve highway safety by ensuring that drivers of trucks, buses, and other large vehicles are qualified. Some components of the regulations pertain to drivers to ensure operators have appropriate driving skills and knowledge, adhere to motor vehicle laws of the road, and meet medical standards. Other components require employers to ensure strict compliance with the regulations through the adoption of policies and procedures that establish oversight responsibility of employee's driving records and health status.

Background

Federal regulations define job responsibilities that require a commercial driver's license. Montgomery County government has established a number of job classifications that fall within the federal statutory definitions and thus require a commercial driver's license. (See Appendix.) At the time of this inspection, there were 949 positions in those job classifications 856 were filled and 93 were vacant. The overwhelming majority of positions were in the Department of Public Works and Transportation (803) with fewer numbers in the Department of Liquor Control (43), Fire and Rescue Services (8)¹, and Department of Public Libraries (2)². The Department of Public Works and Transportation (DPWT) includes the division of Transit Services, the division of Fleet Management Services, and the Highway Maintenance Section.

¹ The Fire and Rescue Service positions are mechanics. Firefighters are exempt from CDL regulations.

² Public Library positions requiring CDL licensing have been eliminated for budgetary reasons.



INTRODUCTION (Continued)

Scope, Objectives, and Methodology

The inspection was performed in accordance with Government Auditing Standards, 2003 Revision issued by the Comptroller General of the United States and Quality Standards for Inspections, issued by the President's Council on Integrity and Efficiency (PCIE), March 1993. Accordingly, we included such procedures considered necessary in the circumstances. We believe our inspection provides a reasonable basis for the findings and recommendations. An inspection is a review of a highly technical matter. According to PCIE Quality Standards for Inspections:

An inspection is a process...aimed at evaluating, reviewing, studying, and/or analyzing the programs and activities of a Department or Agency for the purposes of providing information to managers for decision making, for making recommendations for improvements to the program, policies or procedures, and for administrative action.

Scope and Objectives

The inspection period for the review of commercial driver's license practices is fiscal years 2003 and 2004.

The general objective of the inspection was to evaluate compliance with applicable laws and regulations. Specific objectives of the inspection were as follows:

- To determine whether the County has established adequate management controls to ensure overall organizational compliance with commercial driver's license regulations, including assigned accountability;
- To determine whether management controls have established effective monitoring of employee compliance with CDL regulations;
- To verify that all County employees required to possess a commercial driver's license have a current, valid CDL; and
- To determine whether pertinent prior audit recommendations have been fully implemented.

Methodology

We reviewed federal and state laws and regulations and organizational policies and procedures applicable to commercial driver's licensing. Inquiries were made to management regarding existing organizational controls monitoring compliance with applicable federal and state laws and organizational policies and procedures. We identified all County positions requiring a commercial driver's license and the employees assigned to those



INTRODUCTION (Continued)

positions. Management controls over commercial driver's licensing compliance were reviewed and tested at the County, department, division, and section level. The review and testing also included an evaluation of management knowledge of federal and state regulatory requirements. We then verified that each employee possessed a current, valid commercial driver's license. Finally, we reviewed prior audit findings and recommendations pertaining to pertinent aspects of CDL regulations and inquired about the status of prior audit recommendation implementation.

Management Controls

Management controls are the organization, policies, and procedures used by an agency to provide reasonable assurance that laws and regulations are followed, and that reliable and timely information is obtained, maintained, reported, and used for decision-making.

Effective oversight requires strong management controls. With regard to commercial driver's license practice and procedure, management controls should include written policies and procedures that address key concepts of verification, compliance by both employee and department, and documentation. Further, because commercial driver's license requirements affect multiple departments, management controls should provide uniform guidance for all employees and departments to ensure consistency in compliance with applicable laws and regulations and to identify best practices to improve efficiency and effectiveness at all locations.

Specific management control standards require documentation, the recording of events and transactions, supervision at an appropriate organizational level, and the assignment of accountability to ensure compliance with federal and state regulations.

Federal and State Regulations

In 1986, the federal government took the lead to improve safety on this country's roads. While the law was careful not to encroach on the right of states to issue driver's licenses the federal law closed loopholes such as the one allowing drivers to retain licenses from multiple states and imposed significant record-keeping requirements on the employers of drivers holding a CDL. These record-keeping requirements were meant to ensure that employers of CDL drivers only used drivers who meet the highest safety standards. Federal regulations, enacted in 1986, are found in CFR Title 49 Transportation. Most states followed the lead of the federal government shortly thereafter. In Maryland, state laws were enacted in 1990 and are found in Maryland Code Transportation, Title 16, Subtitle 8.

Employers are required, among other things, to conduct an annual review of a CDL-employee's driving record to determine whether the employee is qualified to operate a commercial motor vehicle, to maintain a copy of the driving history for three years, and to record the name of the person conducting the review. Further, the employer is required to maintain a number of documents pertaining to the CDL license and qualification process in a "driver's qualification file" (DQF). The DQF can be either a separate file or combined with a personnel file. The documents required to be maintained include: the initial application for employment, written record of background checks with prior employers,



INTRODUCTION (Continued)

certificate of driver's road test, hardcopy of driving history report, written note of annual review of driving record, a list or certificate relating to motor vehicle violations, and medical examiner's certificate of physical qualification. The employer must require an employee to provide annually a list of motor vehicle law violations or a certificate affirming that no violations have occurred. Documents are to be maintained for three years even after the person leaves the position or the position has been eliminated.

County Organizational Policies, Procedures, and Practices

County policies, procedures, and practices regarding CDL regulation compliance have evolved over time. There are written policy and procedure documents but none represent a comprehensive guide to CDL compliance issues. Office of Human Resources (OHR) staff identified a Departmental Procedure (DP) directive issued in 1983, Department of Transportation DP No. IX, as the current controlling policy and procedure document³. While this directive addresses the responsibilities of all employees related to maintaining a valid motor vehicle license and departmental responsibilities for reviewing employee-driving records, the directive was issued several years before federal and state CDL regulations were enacted. The directive does not address many important provisions specific to compliance with CDL regulations.

The County has also issued written policies and procedures related to drug and alcohol testing for employees with CDL licenses. Administrative Procedure (AP) 4-11, issued in 1991, and Personnel Regulations, Section 32, revised in 2001, were often cited as controlling policy. However, there was uncertainty among operating unit staff over whether AP 4-11 was still in effect. According to management level staff in OHR, much of AP 4-11 is outdated and the entire policy is under review. Testing for drug and alcohol is an important component of CDL regulations. However, neither of these policies, if both are in effect, provides for total compliance with applicable federal and state regulations. Further, Section 32 applies only to Transit employees, which does not include all county CDL employees.

³ The Department of Transportation has since been absorbed into the Department of Public Works and Transportation as currently organized.

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SUMMARY

We undertook this inspection as a result of a citizen complaint. After assessing potential risk exposure to the County because of non-compliance with federal and state Commercial Driver's License regulations, we deemed the public safety issues addressed by the regulations to be of high importance and sensitivity. Motor vehicle accidents or other driving infractions caused by non-compliant County CDL operators could expose the County to liability. An initial review of motor vehicle administration records indicated that most, but not all, employees holding County CDL-required positions possessed the appropriate state CDL driver's license. The possibility that even a small number of employees did not possess the required license was a 'red flag' that management controls were not as effective as they could be. Additional initial inquiries into existing management controls revealed further potential weaknesses with respect to CDL record keeping.

The County's management controls over CDL compliance can best be described as decentralized. There is no senior management level position assigned centralized oversight responsibility. Senior management perception is that oversight is occurring at the division level in large departments or at the department level of operational units. That perception is misplaced. The decentralized approach has resulted in each unit developing its own practices or not. Most importantly, the effect has been that organizational compliance with CDL regulations has been inconsistent.

No organizational unit fully complies with CDL regulations. None maintains a DQF although one department does file most of the required documents in the employee personnel file. None requires CDL employees to provide annually a list of motor vehicle law violations or a certification that no violations have occurred. Several units with large numbers of CDL employees do not conduct an annual review of driver history records. Most units have developed their own in-house database to track CDL license expiration dates and medical examination dates. Databases are in different programs such as Excel, Access, etc., and contain different information fields. Those databases are not necessarily shared between centralized units, such as OHR or Occupational Medical Services and operational units. Most managers with CDL compliance responsibilities have not received formal training in CDL compliance requirements but rely instead on informal, on-the-job training and updating as regulations change.



SUMMARY (Continued)

Results in Brief

The inspection identified material weaknesses in management controls that have resulted in significant noncompliance with CDL regulations. County management controls lack comprehensive written policies and procedures and lack assigned oversight accountability at an appropriate management level to ensure compliance with regulations.

The County concurred with one, and concurred in part with two findings and recommendations. Findings include the following:

- The County has not provided operating unit managers responsible for CDL regulatory compliance with adequate training and access to authoritative and comprehensive guidance for CDL program management. (**Finding 1, p. 7**);
- The County has not provided operating unit managers responsible for CDL program management a comprehensive policy and procedures manual. (**Finding 2, p. 8**);
- County operating units are not in compliance with CDL record-keeping requirements. (**Finding 3, p. 10**).

Summary of Findings

No.	Title of Finding	Page	Council Action Required	Agency Response
1	Inadequate Management Controls	7	No	CONCUR IN PART
2	Lack of Comprehensive Written Policies and Procedures	8	No	CONCUR
3	Inadequate Compliance with CDL Regulations	10	No	CONCUR IN PART

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FINDINGS AND RECOMMENDATIONS

Finding 1: Inadequate Management Controls

We found management controls over CDL regulation compliance are inadequate. We interviewed department and division managers regarding their knowledge of regulatory requirements, knowledge of current CDL-related issues, training in CDL compliance, and source of information regarding changes in CDL regulations or other related issues. Managers with CDL responsibility stated that there are no countywide written policies and procedures and no authoritative centralized source of information on CDL regulations.

Many managers advised that current practices are based on on-the-job training and informal sources of information. Many of those managers referred to one experienced division manager as an informal source of information. However, that manager, although experienced and helpful, had no assigned oversight for the practices of other organizational entities. Further, that manager has never received formal instruction in CDL compliance requirements. Many program managers suggested that County efforts to comply with CDL regulations would greatly benefit by having a centralized authority, responsible for developing Countywide policy and procedures, providing notice of changes in federal and state regulations, developing training programs for employees and managers, and serving as a general point of contact for CDL-related issues.

Effective management controls require that County government should clearly establish and assign accountability for regulatory compliance. Further, even in a decentralized management control structure; there should be a centralized authority to provide oversight to ensure consistent countywide compliance with federal and state regulations.

Recommendation:

We recommend the Chief Administrative Officer (CAO) improve management controls as follows:

- Assign accountability for organization-wide compliance to a centralized management position; and

FINDINGS AND RECOMMENDATIONS (Continued)

- Ensure all CDL employees and department administrators receive training on their respective CDL-related responsibilities.

Agency Response:

***We concur in part.** Formal training is needed to improve the supervisory oversight practices and the CDL compliance requirements. Responsibility for providing this training, updating regulations related to CDL compliance, developing policies and procedures to guide County Government departments in complying with CDL requirements, and notifying County Departments of changes in federal and state regulations should be centralized in the Office of Human Resources (OHR). Additional resources may be needed to assist OHR in initiating these new training programs and developing the standard CDL policies and procedures. However, we are still evaluating whether managing these CDL responsibilities for the County is best accomplished through a full time position, part time position, or through a contract. Since the appropriation of these additional resources is subject to the budget process we are not able to commit that these resources will be available in FY06.*

***We do not concur in part.** Responsibility for compliance monitoring should be vested in the Director's Office of each department that maintains and uses equipment requiring a CDL. The Director's Office of each department would ensure compliance with regulations and consistency in the way the procedures and regulations are applied, and in assuring continuous training for those who will be involved in the review and reporting system.*

Finding 2: Lack of Comprehensive Written Policies and Procedures

We found the County does not have comprehensive policies and procedures to guide departments and employees in complying with federal and state commercial driver's license regulations.

We requested copies of all County written policies and procedures addressing CDL regulation compliance. We inquired of program managers as to what written policies they referred to for guidance. The responses were inconsistent and contradictory. OHR provided a copy of a Departmental Procedure, Department of Transportation, numbered Administrative No. IX, titled 'Review of Driving Records' which was issued in 1983, as the current controlling policy. Most program managers stated that there were no County policies. Some referred to Administrative Procedure 4-11, issued in 1991, while others stated AP 4-11 was no longer in force. A few referred to Section 32 of the County Personnel Regulations.

We reviewed Departmental Procedure (DP) No. IX, Administrative Procedure 4-11, Section 32 of the Personnel Regulations, and other related memoranda. DP No. IX pre-dates the enactment of CDL regulations by several years. While the directive requires all employees to maintain a valid driver's license, the directive does not address the more extensive requirements imposed by federal and state CDL regulations. A DPWT manager stated that

FINDINGS AND RECOMMENDATIONS (Continued)

DP No. IX needed to be up-dated. A senior OHR manager stated that many sections of AP 4-11 were outdated. AP 4-11, which may or may not be in effect, and Personnel Regulation Section 32 both focus on drug and alcohol testing requirements. Neither of these directives addresses other important aspects of CDL compliance. We also noted that Personnel Regulation Section 32 applies only to “Safety-Sensitive Transit” positions subject to FTA regulations (emphasis added). Further, not all County CDL positions are Transit positions and not all CDL positions fall under FTA jurisdiction.

A comprehensive policy and procedures document would serve as a source of information and guidance to all departments and employees and would provide a common reference to ensure uniformity and consistency in compliance with all applicable CDL regulations.

Recommendation:

We recommend the County develop and issue a comprehensive policy and procedures document addressing all aspects of CDL regulation compliance. The document should clearly establish areas of responsibility and assign accountability to ensure uniform and consistent compliance by departments and employees.

Agency Response:

***We concur.** DPWT and all affected departments should assist OHR in developing comprehensive policies and procedures addressing all aspects of CDL regulation compliance. This document will serve as the standard reference for all County Government departments to ensure consistency and clarity in complying with CDL regulations.*

However, in some cases, it will be necessary to collectively bargain these policies, procedures, and regulations with the appropriate collective bargaining unit since these rules would affect working conditions for bargaining unit employees. The County is currently under a three year contract with the Municipal and County Government Employees Organization (MCGEO) and the Fraternal Order of Police (FOP) which will expire on June 30, 2007. The Union is under no obligation to re-open the contract to discuss these issues though. The contract with the International Association of Firefighters (IAFF) is scheduled to expire on June 30, 2008. However, by a “side-letter” arrangement, we have agreed to continue negotiations on driver related and other operational issues.

OHR is currently in the process of rewriting the County’s drug and alcohol testing regulations for incorporation in the Personnel Regulations. Although Section 32 of the Personnel Regulations in its current state applies only to Safety-Sensitive Transit positions (those that are covered by Federal Transit Administration (FTA) regulations), we also plan to include in Section 32 the current drug and alcohol testing requirements for employees covered by the Federal Motor Carrier Safety Administration regulations.

FINDINGS AND RECOMMENDATIONS (Continued)

The County's substance abuse management program for employees that are subject to Federal Transit Administration regulations was audited by the FTA in the latter half of 2004. In January 2005, the FTA approved MCPR Section 32 as complying with the Federal regulations so long as it is revised as proposed.

AP No. 4-11 remains in effect for all employees except for the Safety-Sensitive Transit employees covered by the current Section 32 and the Safety-Sensitive employees covered by the Federal Motor Carrier Safety Administration regulations.

Finding 3: Inadequate Compliance with CDL Regulations

We found that no County department complies with all provisions of CDL regulations.

CDL regulations impose certain requirements on employers of CDL-required positions. Some of the more important requirements include: conducting an annual review of a CDL-employee driving record, requiring employees to provide immediate notification of driving offenses, requiring employees to submit an annual statement of driving offenses or a certification that no offenses have occurred, and maintaining required documents in a driver qualification file for each employee. CDL regulations require some documents be kept a minimum of three years and some records such as the original employment application and records review must be kept for the entire length of employment plus three years post-employment.

We questioned personnel described as having CDL administrative responsibilities regarding required documentation. Some were unaware of the specifics imposed by federal regulations. Some were aware of the requirements but readily acknowledged that their operational unit was not in compliance. We attempted to test department practices by reviewing files for documents required to be maintained but were informed by many managers that files and documents did not exist. Some maintained partial, incomplete files.

Management-level staff in OHR stated that departmental representatives have authorization to review the Maryland Motor Vehicle Administration (MVA) database and do so on an annual basis. In contrast, most operational administrators report that they do not currently have authorization to access the MVA database (some are awaiting training to acquire authorization) and have not conducted an annual review for years.

Management-level staff in OHR also stated that operational unit representatives only note non-compliance with motor vehicles laws. That practice, if actually followed, would not comply with CDL regulations.

We reviewed MVA records for each CDL employee identified by OHR. We found several who did not appear to possess a currently valid CDL and others who had been convicted of serious motor vehicle law violations during the period when they were County employees.

FINDINGS AND RECOMMENDATIONS (Continued)

Overall, County departments are not complying with even the most basic regulatory requirements. Most department/divisions do not maintain a file of required information, do not routinely conduct an annual driving record review (and have not done so for years), and do not require CDL employees to file an annual certification on driving violations. Only one unit had a well-established practice of conducting an annual review of CDL employee driving history and filing and maintaining most required documentation.

Recommendation:

We recommend the CAO ensure County departments fully comply with CDL regulations. We further recommend the County research and implement “best practices” to be followed by all County departments. At a minimum, departments should conduct an annual driving history review, require employee certification regarding motor vehicle law violations, and maintain required documentation.

Agency Response:

We concur in part. Each County Government department must conduct an annual review of CDL employee driving history, file and maintain required documentation, and require employee certification regarding motor vehicle law violations. As stated in our response to Finding #1, the Director’s Office of each affected department will have this compliance monitoring responsibility and will report annually to OHR and the CAO that this compliance monitoring and oversight has been completed.

A compliance checklist will be developed and each department will be required to electronically file this report annually to OHR and the CAO certifying that they are in compliance and append a list of each vehicle requiring a CDL and each employee and position requiring a CDL. While other requirements may be added, this checklist would include the following:

- All positions and incumbents identified and registered in a commonly maintained database*
- Annual physical examinations scheduled and documented*
- License renewals scheduled and documented*
- Certification that individuals are properly classified for the vehicle they are operating*
- Annual driver statements on offenses coordinated and documented*
- Coordinator registration and certification in use of MVA database*
- Coordination and documentation of drug testing – random, after accidents & for cause*
- Annual training of CDL driver’s supervisors*
- Training of CDL holders whenever federal/state laws change*
- File maintenance for each CDL holder*

FINDINGS AND RECOMMENDATIONS (Continued)

The Division of Risk Management in the Department of Finance is currently developing a Driver's License Program for all employees who drive County vehicles (both CDL and non-CDL drivers) on a regular basis. This will be a notification process with the Maryland MVA. The County will provide the MVA with driver's license numbers to the MVA and the MVA will send a notice if the conditions of the license have changed (i.e. driver got a ticket for any reason, license is suspended, etc.). Risk Management will get a notice from MVA and Risk Management will notify the appropriate department head with a recommended course of action. We are investigating whether we can use this program as a part of our CDL compliance efforts.

To the extent that annual physicals are required for CDL compliance this will present a need for additional resources if not already budgeted. These additional resources are, of course, subject to the annual budget process.

The best practices to be developed and followed will be incorporated into the standard policies and procedures to be developed by OHR.

As with our response to Finding #2, it may be necessary to collectively bargain certain compliance requirements with the County's collective bargaining units as well as to negotiate with the Local Fire and Rescue Department's Representative pursuant to Section 21-6 of the Montgomery County Code.

We do not concur in part. *Based on the findings it is too sweeping a statement to say that, "... County departments do not comply with important provisions of CDL regulations." A more accurate statement would be to say that County departments comply with important CDL regulations on an inconsistent basis. The findings do not indicate that there was no compliance, but rather discusses compliance in limited terms as "some" or "most". The findings indicate that compliance is inconsistent, not that it is non-existent. For example, the findings cite a unit of one department as having a well established practice of annually reviewing CDL employee driving history and filing and maintaining appropriate documentation. This is not to say that significant improvements are not required for CDL compliance, but that there is compliance albeit on an inconsistent basis.*

Prior Audit Recommendations

Pursuant to inspection standards, we inquired about prior audit findings and recommendations related to the current inspection objectives. In this instance, we reviewed two audits conducted by the Federal Transit Administration (FTA) of the county's Substance Abuse Management Oversight Program. DPWT Ride-On program staff in bus operator and other "transit safety sensitive" positions (all CDL-required positions) are subject to drug and alcohol testing as part of FTA regulations. These audits cover all aspects of an organization's drug and alcohol testing program, from administrative regulations and forms, to confirming a random distribution of tests and supplemental quality control tests to ensure testing lab accuracy. Failure by the auditee to take corrective action can result in loss

FINDINGS AND RECOMMENDATIONS (Continued)

of federal grant funding. The first prior audit we reviewed was conducted in January 2001 and the second audit was conducted in June 2004.

OIG initially reviewed the findings and recommendations of the January 2001 FTA audit and identified nine issues to confirm that appropriate corrective action had been taken. When we requested follow-up information from the County, we learned that the FTA had notified the County that the FTA would be conducting another audit of the Substance Abuse Management Oversight Program in June 2004. To minimize any workload impact on Ride-On staff, OIG agreed to delay further OIG inquiry until after the scheduled FTA audit was completed. Subsequently, OIG reviewed the FTA 2004 audit report and compared the findings and recommendations of both reports. The most recent report seems to indicate that adequate corrective action has been taken to resolve the prior audit findings. In addition, FTA auditors identified fewer issues of concern in the 2004 audit than in the 2001 audit.

Because of the continuing FTA monitoring of alcohol and drug testing compliance, and the FTA issuance of audit reports focused specifically on this aspect of regulatory compliance, we will not issue separate findings in this area.

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CONCLUSION

Compliance with laws and regulations is a basic obligation of all individuals and organizations including County government. Compliance with CDL regulations is particularly important because those regulations are designed to enhance public safety through improved oversight of commercial vehicle operators.

We recommend that management controls be improved to provide appropriate oversight and accountability. We found existing County management controls are inadequate. There is no centralized source of authority and information and there are no comprehensive written policies and procedures providing guidance to employees and department managers. The decentralized nature of County practices in this area has resulted in varying degrees of compliance. For the most part, County departments are not complying with basic CDL regulation requirements. We recommend that the County implement "best practices" across the organization to ensure full compliance with these important public safety regulations.

We would like to thank management of the various departments, divisions, and sections for the cooperation extended to this office during the course of the inspection.

**COUNTY POSITIONS REQUIRING
COMMERCIAL DRIVER'S LICENSES**

<u>Job Code</u>	<u>Job Title</u>
000112	MANAGER III
000832	PROGRAM MANAGER II
000834	PROGRAM MANAGER I
000837	PROGRAM SPECIALIST I
001166	LIBRARY ASSISTANT I
004118	TRANS SYS TECHNICIAN II
004119	TRANS SYS TECHNICIAN I
004120	TRAFFIC FLD SVS TECH II
004456	TRANSIT SERVICES SUPVR
004457	TRANSIT OPER SUPVR
004458	TRANSIT INFO SYS TECH
004461	TRANSIT COMM SUPERVISOR
004462	TRANSIT COORDINATOR
004466	BUS OPERATOR
005005	EQUIPMENT SERVICES COORD
005007	EQUIP MAINT CREW CHIEF
005008	MECHANIC LEADER
005009	MECHANIC
005013	MOTOR POOL ATTENDANT
005015	AUTOBODY REPAIRER
005017	WELDER
005027	FACILS MAINT SCHEDULER
005110	PAVEMENT MARKING LDR
005111	EQUIPMENT OPERATOR III
005112	EQUIPMENT OPERATOR II
005113	EQUIPMENT OPERATOR I
005205	DISTRICT SUPERVISOR
005211	WORK FORCE LEADER III
005212	WORK FORCE LEADER II
005215	TREE CLIMBER
005216	TREE CLIMBER APPRENTICE
005229	PUBLIC SVS CRAFTSWORKER
005233	PUBLIC SVS WORKER IV
007770	F/R APPAR & EQUIP TECH
008109	WAREHOUSE ASST SUPVR
008112	TRUCK DRV/WAREHOUSE WKR
008115	TRUCK DRV SUB/WHSE WKR
009233	DEPOT SUPPLY COORD